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UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

HARRY L. SAMUEL

)

C.A. No. 05-037-SLR

)

JURY OF 12 DEMANDED

Plaintiff,

)

v.

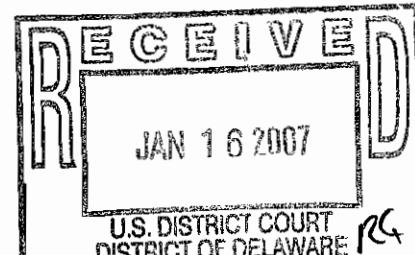
)

THOMAS CARROLL, ET. AL

)

Defendants,

)

**REQUEST FOR PRODUCTION DIRECTED TO PLAINTIFF
BY DEFENDANT FIRST CORRECTIONAL MEDICAL**

The defendant requests the plaintiff to produce for examination and copying at the office of the attorney for defendant on or before thirty (30) days from receipt of this Request:

1. All documents referred to in Plaintiff's Answers to Interrogatories filed simultaneously hereto.
2. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims for medical malpractice, Eighth Amendment violations and deliberate indifference.
3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims of special and general damages (including future lost wages claimed).
4. Please produce your Federal and State income tax returns for the years 1996 through the present.
5. Copies of all bills and receipts evidencing payment of bills for which the plaintiffs seek compensation in this lawsuit.
6. Copies of the curriculum vitae and reports of all experts you intend to call at trial.

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689
Dana Spring Monzo, Del Bar No. 4605
1225 N. King Street, Suite 1100
P.O. Box 397
Wilmington, DE 19899-0397
(302) 655-6749
Attorney for Defendant First Correctional
Medical

January 16, 2007